

James F. Faulstich
HSE Program Manager

Honeywell Resins & Chemicals
Hopewell Plant
905 East Randolph Street
Hopewell, VA 23860
Phone: 804-541-5119
Email: james.faulstich@honeywell.com

August 12, 2013

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611

Kristen Hall
U.S. Environmental Protection Agency
Region III (3AP12)
1650 Arch Street
Philadelphia, PA 19103

Director, Air Protection Division
U.S. Environmental Protection Agency
Region III (3AP00)
1650 Arch Street
Philadelphia, PA 19103

Dennis M. Abraham
U.S. Environmental Protection Agency
Region III (3RC10)
1650 Arch Street
Philadelphia, PA 19103

Deputy Regional Director
Virginia Department of Environmental Quality
Piedmont Regional Office
4949-A Cox Road
Glen Allen, VA 23060

Enforcement Division Director
Virginia Department of Environmental Quality
629 East Main Street
Richmond, VA 23218

Re: DOJ No. 90-5-2-1-09611 – Diesel Switcher Certification

To Whom It May Concern:

Honeywell Resins & Chemicals LLC (“Honeywell”) is making this submittal pursuant to the Consent Decree in United States of America and Commonwealth of Virginia v. Honeywell Resins & Chemicals LLC, the reference for which is Civil Action Number: 3:13-cv-00193-REP, and DOJ Case Number: 90-5-2-1-09611.

Paragraph 37 of the consent decree requires Honeywell to operate only Tier III diesel switcher locomotives (“switchers”) or replacement locomotives that emit NOx equal to or less than Tier III standards at the facility. Honeywell has met this requirement by using the RX500 model of Republic Locomotive switchers that have the Tier III low emission classification.

Paragraph 39 requires the site to submit a certification concerning the switchers. To meet this requirement, Honeywell certifies the following:

- Honeywell was not otherwise required by law to replace the two diesel switchers at the Hopewell Facility with Tier III low emission diesel switchers;
- Honeywell is unaware of any other person who was required by law to purchase the low emission diesel switchers for the Hopewell Facility; and
- Honeywell will not use any aspect of that purchase, or portion thereof, to satisfy any obligations that it may have under other applicable requirements of law.

If you have questions or need additional information, please contact me at (804) 541-5119.

Regards,

A handwritten signature in black ink, appearing to read "James F. Faulstich". The signature is fluid and cursive, with a large initial "J" and a stylized "F".

James F. Faulstich
HSE Program Manager

DOCUMENT CERTIFICATION

Facility Name: Honeywell Resins & Chemicals LLC

Facility Location: 905 East Randolph Road, Hopewell, VA 23860

Type of Submittal Attached: Diesel Switcher Certification

Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Responsible Official: Kevin P. Keller

Title: Site Manager

Signature:

Kevin Keller

Date: August 12, 2013